

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- x 1:21-cv-03154-RA

GRAN SABANA CORPORATION N.V., :
: *Plaintiff,* :
: :
-against- : **ORDER TO SHOW CAUSE
FOR TEMPORARY
RESTRAINING ORDER AND
PRELIMINARY
INJUNCTION**
MITCHELL H. KOSSOFF, :
: *Defendant.* :
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Upon the application of Defendant Mitchell H. Kossoff (“Defendant”), by his counsel Furman Kornfeld & Brennan LLP, the Declaration of Christopher D. Skoczen, Esq. and Aaron M. Barham, Esq., dated June 30, 2021, and the Declaration of Walter Mack, Esq., it is hereby ORDERED, that the above-captioned Plaintiff Gran Sabana Corporation N.V. (“Gran Sabana”) show cause before a motion term of this Court, via teleconference on _____, 2021, at _____ a.m./p.m., why an order should not be entered pursuant to Rule 65 of the Federal Rules of Civil Procedure:

- (1) issuing a stay of this action pending the outcome of criminal investigations of Defendant;
 - (2) issuing a stay of this action pursuant to 11 U.S.C.A. § 362 of the Bankruptcy Law; and
 - (3) issuing a preliminary injunction pursuant to FRCP 65 preventing the entry of any order in this matter as to Defendant pending the outcome of criminal investigation of Defendant and removal of the stay in the related bankruptcy proceeding.

The hearing will be held by telephone. The parties may access the conference using the following information: Call-in number: 212-376-9859, Host Pin: 99983030.

ORDERED that, sufficient cause having been shown, pending the hearing of Defendant's application for a preliminary injunction, pursuant to Rule 65 of the Federal Rules of Civil Procedure, Plaintiff be restrained and enjoined as follows:

1. From moving, petitioning or otherwise seeking any order in this matter compromising Defendant's Constitutional rights pending criminal investigations of Defendant.

ORDERED that a copy of this Order be served upon counsel for Plaintiff via email and Fax and/or via any other method allowed under the rules on or before 5:00 p.m. on _____, which shall be deemed good and sufficient service of this order; and

ORDERED that Defendant email the above-referenced Application, Declaration, Affirmation, and this Order upon counsel for Plaintiff by 5:00 p.m. on _____, 2021.

ORDERED that Defendant file a Proof of Service of the above-referenced Order, Declaration and Affirmation by _____, 2021.

Dated: New York, New York
June 30, 2021

United States District Court Judge
Ronnie Abrams